

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of:

Jordanville Post Office
Jordanville, New York

Docket No. A2011-84

UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(November 16, 2011)

On September 22, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked September 13, 2011, from postal customer Linda Roberts (Petitioner) objecting to the discontinuance of the Post Office at Jordanville, New York. On September 26, 2011 the Commission issued Order No. 874, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). In accordance with Order No. 874, the administrative record was filed with the Commission on October 7, 2011.¹ The Commission received a petition on October 14, 2011 signed by twenty-five customers of the Jordanville Post Office.

The appeal received by the Commission on July 18, 2011 and the administrative record, generally raise two main issues: (1) the effect on postal services and (2) the impact upon the Jordanville community. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service's statutory obligations and Commission precedent,² the Postal Service gave consideration to other issues, including economic savings and

¹ The Postal Service filed an erratum to the record on November 9, 2011.

² See 39 U.S.C. 404(d)(2)(A).

the impact upon postal employees. Accordingly, the determination to discontinue the Jordanville Post Office should be affirmed.

Background

The Final Determination To Close the Jordanville, NY Post Office and Continue to Provide Service by Rural Route Service (FD), as well as the administrative record, indicate that the Jordanville Post Office provides EAS-13 level service to 59 Post Office Box customers, 217 general delivery customers. The Jordanville Post Office provides retail service 39.5 hours per week.³ The postmaster of the Jordanville Post Office retired on January 2, 2009 and a temporary officer-in-charge (OIC) was installed. Upon implementation of the final determination, the OIC will return to her position at a nearby office, and may be separated from the Postal Service.⁴ The average number of daily retail window transactions at the Jordanville Post Office is 28.8. Revenue has generally been low: \$31,647 (83 revenue units) in FY 2008; \$34,667 (90 revenue units) in FY 2009; and \$37,162 (97 revenue units) in FY 2010.⁵ The Jordanville Post Office has no meter customers and one permit customer.⁶

Upon implementation of the FD, delivery and retail services will be provided by rural route delivery administered by the Richfield Springs Post Office, an EAS-18 level

³ Final Determination to Close the Jordanville, NY Post Office and Continue to Provide Service by Rural Route Service ("FD") at 2 (p. 411); Item No. 18, Post Office Closing Proposal Fact Sheet ("Fact Sheet") at 1 (p. 33). In these comments, specific items in the administrative record are referred to as "Item ____." Because of the size of the administrative record totaling 424 pages, the pages of such administrative record have been numbered in order at the bottom of each page, and such pages are indicated in parentheses in each footnote.

⁴ FD at 7 (p. 416); Fact Sheet at 1 (p. 33); Item No. 33, Proposal to Close the Jordanville, AR Post Office and Continue to Provide Rural Route Service ("Proposal"), at 9 (p. 404).

⁵ FD, at 2 (p. 411); Fact Sheet, at 1 (p. 33); Proposal, at 2 (p. 397).

⁶ Fact Sheet, at 1 (p. 33).

office located five miles away, which has 223 available Post Office Boxes.⁷ These deliveries will be made to either Cluster Box Units (CBUs), roadside mailboxes, or a combination of both.⁸

The Postal Service followed the proper procedures which led to the posting of the FD. All issues raised by the customers of the Jordanville Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and FD, customers received notice through other means. Questionnaires were distributed to delivery customers of the Jordanville Post Office. Questionnaires were also available over the counter for retail customers at Jordanville.⁹ A letter from the Manager of Post Office Operations, Albany, NY, was also made available to postal customers, which advised customers that the Postal Service was evaluating whether the continued operation of the Jordanville Post Office was warranted, and that effective and regular service could be provided. Such letter also advised of a community meeting at the Jordanville Town Hall, which was held on May 4, 2011.¹⁰ The letter invited customers to complete and return a customer questionnaire. Customers were encouraged to express their opinions about the service they were receiving and the effects of a possible change involving

⁷ FD at 2 (p. 411); Fact Sheet, at 1 (p. 33); Proposal, at 2 (p. 397).

⁸ See, Post Office Survey Sheet at 2 (p. 27) (noting that the Postal Service is investigating the potential installation of CBUs at the Jordanville City Hall or at another local business); *see also*, Rural Route Carrier Estimated Cost for Alternative Replacement form, Item 17 at 2 (p. 32) (setting forth the estimated cost of providing roadside mailbox service).

⁹ FD at 2 (p. 411); Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Jordanville Post Office (p. 35).

¹⁰ Letter from Deb Labello, Manager of Post Office Operations, Albany, NY ("Letter") Item 23 at 1 (p. 36).

rural route delivery.¹¹ The returned customer questionnaires and Postal Service response letters appear in the administrative record.¹² An analysis of these response letters was performed.¹³ In addition, representatives from the Postal Service were available at the Jordanville Town Hall for a community meeting on May 4, 2011 to answer questions and provide information to customers.¹⁴ Customers also received formal notice of the Proposal and potential FD through postings at the Jordanville Post Office and the Richfield Springs Post Office. The Proposal was posted with an invitation for public comment at the Jordanville Post Office as well as the Richfield Springs Post Office for more than 60-days commencing on May 17, 2011 until the close of business on July 18, 2011.¹⁵ The FD was posted at the Jordanville and Richfield Springs Post Offices starting on September 9, 2011, as confirmed by the round-dated FD cover sheets that appear in the administrative record.¹⁶

In light of the postmaster vacancy, a minimal workload, low office revenue,¹⁷ the variety of delivery and retail options (including the convenience of rural delivery and retail service),¹⁸ very little recent growth in the area,¹⁹ minimal impact upon the community, and the expected financial savings,²⁰ the Postal Service issued the FD.²¹

¹¹ Letter at 1 (p. 36).

¹² Customer Questionnaires returned or collected and response letters (pp. 41-354).

¹³ Postal Service Customer Questionnaire Analysis, Item 23 at 1-2 (pp. 355-56)).

¹⁴ FD at 2 (p. 411); Letter at 1 (p. 36); Item No. 24, Community Meeting Roster at 1-2 (pp. 357-58); Community Meeting Analysis, Item 25 at 1-3, (pp. 359-61); Proposal, at 2 (p. 397).

¹⁵ Item 35 at 1 (p. 380) Instructions to OIC regarding Proposal and Comment Period; also see, Notice for Comments for both Jordanville and Richfield Springs Post Offices (pp. 383, 385).

¹⁶ FD Cover Sheets at 1-2 (pp. 423-24).

¹⁷ See generally, FD, Fact Sheet and Proposal.

¹⁸ FD at 2-6 ((pp. 411-415); Proposal, at 2-7 (pp. 397-402).

¹⁹ FD at 6-7 (pp. 415-16); Proposal at 7 (p. 402); Community Survey Sheet, Item 16 at 1-3 (pp. 28-30).

²⁰ FD at 7 (p. 416); Item No. 17 (pp. 26-29), Item No. 18 (p. 30) Proposal at 5 (p. 64).

²¹ FD at 1-9 (pp. 410-418).

Regular and effective postal services will continue to be provided to the Jordanville community in a cost-effective manner upon implementation of the final determination.²²

Each of the issues raised by the Petitioner is addressed in the paragraphs which follow.

Effect on Postal Services

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Jordanville Post Office on postal services provided to Jordanville customers. The closing is premised upon providing regular and effective postal services to Jordanville customers.

The Petitioner, in her letter of appeal, raises the issue of the effect on postal services of the Jordanville Post Office's closing, noting that customers of Jordanville will have to travel to nearby Post Office, thereby increasing fuel costs. These concerns were considered by the Postal Service. In particular, the Postal Service explained that customers will continue to receive regular and effective postal services.²³ The Postal Service explained that services provided at the Jordanville Post Office will be available through the rural carrier, and has made clear that special provisions will be made for hardship cases or special customer needs, particularly senior citizens, to ensure that all customers of Jordanville continue to receive regular and effective postal services.²⁴

The effect of the closing of the Jordanville Post Office on the shipping of

²² FD at 6 (p. 415).

²³ FD at 6 (p. 415); Proposal at 7 (p. 402).

²⁴ FD at 2-6 (pp. 411-15); Proposal at 2-7 (pp. 397-402).

packages was also given consideration.²⁵ Upon the implementation of the Final Determination, service will be provided to CBUs, roadside mailboxes, or a combination of both that would be installed on the carrier's line of travel, so that customers do not have to make a special trip to the Post Office for service.²⁶ CBUs provide the security of individually locked mail compartments, which was a specific concern voiced by individuals from the Jordanville community.²⁷ The utilization of rural carrier service offers customers the ability to securely perform most transactions currently available at the Jordanville Post Office.²⁸ Through Stamps by Mail and Money Order Application forms, most transactions do not require customers to meet the carrier at the mailbox.²⁹ Various options also exist for the shipping of packages, which are explained on www.usps.com. If internet access is available, the Postal Service's Click-N-Ship service enables customers to print shipping labels with postage for Express Mail and Priority Mail. Carrier pickup is available, which allows for scheduling the pickup of packages at the same time the carrier delivers the mail.³⁰ In addition, the Postal Service explained that the Richfield Springs Post Office can provide answers to questions about possible options for the shipping of packages from a Jordanville address.³¹

The Postal Service has considered the impact of closing the Jordanville Post Office upon the provision of postal services to Jordanville customers. Rural route delivery to roadside mailboxes or CBUs installed on the carrier's line of travel provides

²⁵ FD at 3 (p. 412); Proposal at 3 (p. 398).

²⁶ FD at 6 (p. 415) (noting the convenience of Cluster Box Units).

²⁷ FD at 6 (p. 415) (noting the security of Cluster Box Units).

²⁸ FD at 3-4 (pp. 412-13); Proposal at 3-4 (pp. 398-99).

²⁹ FD at 4 (p. 413); Proposal at 4 (p. 399).

³⁰ FD at 5 (p. 414); Proposal at 5 (p. 400).

³¹ FD at 2, 6 (pp. 411, 415).

similar access to retail service, alleviating the need to travel to the Post Office.³² Thus, the Postal Service has properly concluded that all Jordanville customers will continue to receive regular and effective service via rural route delivery to roadside mailboxes or CBUs installed on the carrier's line of travel.

Effect upon the Jordanville Community

The Postal Service is obligated to consider the effect of its decision to close the Jordanville Post Office upon the Jordanville community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to discontinue a Post Office. Jordanville is an unincorporated community located in Herkimer County.³³ The community is administered politically by the Town of Warren, and police protection is afforded by the New York State Police.³⁴ Fire Protection is provided by the Richfield Springs Fire Department.³⁵ The community is comprised of retired persons, the self employed, a large Russian population, and those who commute to work at nearby communities and local businesses.³⁶

The Petitioner's letter of appeal and the administrative record raise the issue of the effect of the closing of the Jordanville Post Office upon the Jordanville community. Specifically, Petitioner states that the Post Office is vital to the community. This issue was extensively considered by the Postal Service, as reflected in the administrative

³² FD at 4, 6 (pp. 413, 415) (explaining the benefits to senior citizens and the positives of CBUs).

³³ FD at 7 (p. 416).

³⁴ FD at 7 (p. 416).

³⁵ FD at 7 (p. 416).

³⁶ FD at 7 (p. 416).

record.³⁷ The Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of its name.³⁸ Communities generally require regular and effective postal services and these will continue to be provided to the Jordanville community. Carrier service is expected to be able to handle any future growth in the community, and there is no indication that the business community will be affected adversely.³⁹ The Postal Service noted that questionnaires received from residents of Jordanville indicated that they would continue using local businesses even if the Jordanville Post Office was discontinued.⁴⁰

In addition, the Postal Service has concluded that nonpostal services provided by the Jordanville Post Office can be provided by the Richfield Springs Post Office. In addition, government forms usually provided by the Post Office are also available by contacting local government agencies.⁴¹

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Jordanville Post Office on the community.

Economic Savings

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that rural route carrier service would cost the Postal Service substantially less than maintaining the Jordanville Post Office and would still provide

³⁷ FD at 7 (p. 416); Proposal at 7-8 (pp 402-403).

³⁸ FD at 7 (p. 416); Proposal at 7 (p. 402).

³⁹ FD at 7 (p. 416); Proposal at 7 (p. 402).

⁴⁰ FD at 7 (p. 416); Proposal at 7 (p. 402).

⁴¹ FD at 7 (p. 416); Proposal at 7 (p. 402).

regular and effective service.⁴² The estimated annual savings associated with discontinuing the Jordanville Post Office are \$48,071.⁴³

Economic factors are one of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies, which is noted throughout the administrative record, consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv).⁴⁴

The Postal Service determined that carrier service is more cost-effective than maintaining the Jordanville postal facility and postmaster position.⁴⁵ The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations. The Postal Service, therefore, has considered the economic savings to the Postal Service resulting from such a closing, consistent with its statutory obligations and Commission precedent. See 39 U.S.C. § 404(d)(2)(A)(iv).

Effect on Employees

As documented in the record, the impact on postal employees is minimal. The postmaster of the Jordanville Post Office retired on January 2, 2009 and a temporary officer-in-charge (OIC) was installed. Upon implementation of the final determination, the OIC will return to her position at a nearby office, and may be separated from the Postal Service.⁴⁶ The record shows that no other employee would be affected by this closing.⁴⁷ Therefore, in making the determination, the Postal Service considered the

⁴² See generally, FD at 1-9 (pp. 410-18); Proposal at 1-9 (pp. 396-404).

⁴³ FD at 7 (p. 416); Proposal, at 9 (p. 404).

⁴⁴ FD at 7 (p. 416); Proposal, at 9 (p. 404).

⁴⁵ FD at 7 (p. 792).

⁴⁶ FD at 7 (p. 416); Fact Sheet at 1 (p. 33); Proposal at 9 (p. 404).

⁴⁷ FD at 7 (p. 416); Proposal at 9 (p. 404).

effect of the closing on the employees at the Jordanville Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

Conclusion

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Jordanville Post Office on the provision of postal services and on the Jordanville community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Jordanville customers.⁴⁸ The Postal Service respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Jordanville Post Office should, accordingly, be affirmed. The Postal Service respectfully requests that the determination to close the Jordanville Post Office be affirmed.

Respectfully submitted,

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⁴⁸ FD at 6 (p. 415).

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November 16, 2011